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FCC Mail Room



Federal Communications Commission
Office of the Secretary



WC: 10-90



August 29, 2014

EX PARTE OR LATE FILED

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20536

Dear Chairman Wheeler:

We write to urge the Federal Communications Commission to take adequate steps that maximize the Connect America Fund's ability to deliver high quality broadband service to rural areas. As you know, access to high-quality Internet services is crucial to the economic and overall well-being of rural America. Rural communities require the same quality of broadband service in order to access comparable health, education and other vital services that are delivered to their urban counterparts.

We are pleased that the Federal Communications Commission (FCC) recognizes the challenges facing rural America and is taking steps – through its Connect America Fund II (CAF II) regulations – to address them. While we applaud your efforts to advance the second round of Connect America Funds, we wish to convey our concerns in three areas that if addressed will maximize the effectiveness of CAF II's ability to deliver on its promise to bring high-quality broadband service to rural America.

First, we remain concerned that lack of independent verification of eligibility within portions of a census block may limit CAF II's ability to provide adequate broadband access to all residents within the respective geographic area. It is critical to allow funds to be used to reach all un-served, high-cost households, including those living in the same census block as a household that does have access to 10 Mbps broadband. In order to achieve this goal CAF II should require any service claims to be verified through a strong and independent challenge. This issue is particularly relevant in areas that face challenges in accessing service as a result of geography in the mountain west and variations in population density across individual census blocks.

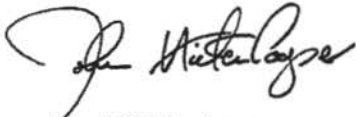
Second, while we certainly need an all of the above approach with regard to the utilization of new and burgeoning technologies, CAF II must ensure that we prioritize infrastructure that serves as a backbone for broadband deployment that can deliver broadband at adequate speeds to a broader network. Any equivalency tests to services that will provide broadband services should meet reasonable network build-out parameters with regard to capacity, cost and reliability.

Third, we are encouraged by the ambitious plan to increase download speed from 4 Mbps to 10 Mbps and know that it will have a far-reaching impact. While we must move swiftly, we must also provide a reasonable time frame and flexibility should a provider find a five year time limit a difficult mandate to meet. Allowing the funding period to be extended up to ten years appears to be a reasonable solution should difficulties arise in building the higher capacity networks, especially in areas that have limited access through the year due to topography, weather or other reasons.

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We hope that the commission will fully consider these recommendations that will enhance our states' rural areas to remain competitive in a globalized and technologically advanced economy. These improvements can ensure that CAF II can meet its goals and expand broadband in rural areas where it is needed. In addition, individual states may have submitted specific comments that correspond to their respective needs and these should be referenced as their official comments.

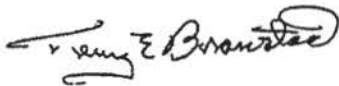
Sincerely,



John W. Hickenlooper
Governor of Colorado



Gary Herbert
Governor of Utah



Terry Branstad
Governor of Iowa

cc: Commissioner Mignon Clyburn, Commissioner Jessica Rosenworcel, Commissioner Ajit Pai,
Commissioner Michael O'Rielly